

DISCOVERY PLAN WORKSHEET

(Please be advised that the Court's Individual Rules include additional forms to be used in cases involving claims of adverse employment or FLSA violations.)

Tier I Pre-Settlement Discovery

Deadline for completion of Rule 26(a) initial disclosures and HIPAA-complaint records authorizations:

April 2, 2018

Completion date for Phase I Discovery as agreed upon by the parties:

April 2, 2018

(Reciprocal and agreed upon document production, generally not including depositions, unless otherwise agreed. No more than 30 days after Initial Conference)

**as part of Phase I Discovery, the parties will exchange documents pursuant to the initial discovery protocols for employment cases alleging adverse action (Appendix E of the Court's Rules)*

Status conference TBD by the court:
(Generally 15 days post Tier I Discovery)

Tier II Discovery and Motion Practice

Motion to join new parties or amend the pleadings:
(Presumptively 15 days post status conference)

May 2, 2018

First requests for production of documents and for interrogatories due by:
(Presumptively 15 days post joining/amending)

May 17, 2018

All fact discovery completed by:
(Presumptively 3.5 months post first requests for documents/interrogatories)

September 5, 2018

Exchange of expert reports completed by:
(Presumptively 30 days post fact discovery)

October 5, 2018

Expert depositions completed by:
(Presumptively 30 days post expert reports)

November 5, 2018

Final date to take first step in dispositive motion practice:
(Parties are directed to consult the District Judge's individual rules regarding such motion practice. Presumptively 30 days post expert depositions)

December 5, 2018

COMPLETION OF ALL DISCOVERY BY:
(Note: Presumptively 9 months after Initial Conference.)

November 30, 2018

Submission of joint pre-trial order:

Final Pre-Trial Conference TBD by the court: